



**G4S Risk Management Group
Non-Judicial External Grievance Policy**



G4S Risk Management Non-Judicial External Grievance Policy

Preface and Document Control

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Document Owner and Approver(s)

Owner	Business Operations and Compliance Manager
Approver(s)	Managing Director, G4S Risk Management

Version Control

Version	Version Date	Document history
V1	Mar 2019	Initial Issue
V2	Jan 2020	Updated Document Approver, transferred to Google Docs format, replaced Director, Secure Services with G4S Risk Management Managing Director, Removed reference to G4S Whistleblowing Policy, Adding a brief clarification on grievance impact categories, Adding hyperlinks to relevant documents, Minor general formatting edits

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1. Document Control

1.1. Purpose

The purpose of this Non-Judicial External Grievance Policy and associated procedures is to:

- Establish an operational level external non-judicial grievance mechanism to address claims of alleged failure by the Company brought by third parties
- It does not include:
 - internal grievances that are managed through Human Resources processes;
 - commercial/contractual disputes that are dealt with under contractual agreements;
 - subcontract or vendor disputes that are managed through procurement agreements

1.2. Scope of Applicability

This Policy applies to all business units (BU) as stated with the [Definition of Risk Management Group](#).

Grievances shall be considered as raised against the Business Unit and not the individual and shall therefore always be within the remit of G4S Risk Management Group. However, where appropriate, a summary of the grievance investigation shall be shared with G4S International Employment Services Limited.

1.2.1. Business Unit Policy and Procedures

BUs are to produce their own Policies and Procedures that align with the requirements of this Policy, taking into account local laws and regulations.

1.3. Review

This Document will be reviewed by the Business Operations and Compliance Manager to ensure suitability and adequacy.

1.4. Normative References

The following documents in whole or part are normatively referenced in this document and are indispensable in its application.

- **UN Guiding Principles on Security and Human Rights**

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- Principle 31 [available here](#) (NB. This is an external non G4S maintained link)
- **The International Code of Conduct for Private Security Providers**
 - Commitment to meet Article 67 [Download Here](#) (NB. This is an external non G4S maintained link)
- **ANSI/ASIS PSC 1:2012 - The Management for Quality of Private Security Company Operations**
 - Clause 9.5.7
- **ISO 18788:2015 – Management System for private security operations**
 - Clause 8.8.3 (Summarised below):

Organisations are to establish procedures to document and address grievances received from internal and external stakeholders. Effectiveness criteria for the grievance procedures shall be established and documented. The procedures shall be communicated to facilitate reporting of non-conformances of this Standard (PSC1 and ISO 18788). Allegations shall be investigated expeditiously and impartially. Documented Procedures shall include:

- Receiving and addressing complaints and grievances
- Establishing hierarchical steps for the resolution process
- Cooperation with official external investigation mechanisms
- The prevention of intimidation of witnesses and inhibiting evidence gathering
- The protection of individuals from retaliation

An investigation shall:

- Identify the Root Cause
- Take Corrective and Preventative Actions including disciplinary action commensurate with any infraction
- Communication with appropriate authorities

Where Grievances allege criminal acts, violations of human rights, or imminent danger these shall be dealt with immediately by the organisation and other authorities as appropriate.

1.5. Terms and Definitions

Grievance	1) a real or imagined cause for complaint 2) an official statement of a complaint over something believed to be wrong or unfair made known to the Company by an External Third Party
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Company	Any G4S Risk Management BU (see Definition of Risk Management Group)
Failure	Improper and/or illegal conduct to designated staff, including such acts or omissions that would violate G4S policies and or values.
Non-Judicial	Not resulting from a court ruling or judgment
BU	Business Unit
External Third Party	<ul style="list-style-type: none">• Clients• Host nation authorities• Communities• Members of the public• Non-governmental organisations• Third country civil and military authorities

2. Roles and Responsibilities

2.1. Third Party Adjudication

Where appropriate, G4S may agree with a complainant to refer the matter to an independent third party for adjudication.

2.2. G4S Risk Management, Managing Director

The Managing Director, G4S Risk Management Group shall manage and approve recommendations for remedy for all grievances in Cat 3-5.

Through chairmanship of the Compliance Committee:

- Monitor the effectiveness of this grievance mechanism to ensure that it is fit for purpose.
- Act as internal arbitrator
- Approve this Policy

2.3. Compliance Oversight Committee

The Compliance Oversight Committee through adherence to the Annual Business Operations Plan, are to fulfil the following:

- Act as the internal arbitration mechanism

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- Review the annual report on grievance activity within the business and ensure preventative actions are implemented (CAPA reviews)

2.4. Business Operations and Compliance Manager (BOCM)

The BOCM is to:

- Develop and manage this Policy and its application
- Report to the Compliance Oversight Committee on Grievance activities.
- Assist and advise the SMT in the assignment of categories
- Investigate and make recommendations for all 3-5 Cat grievances

2.5. BU Managing Directors

BU MDs are to ensure:

- The BU establishes an external non-judicial grievance procedure
- Ensure all grievances are effectively reported
- Ensure thorough and transparent investigation of all Cat 1-2 grievances
- Implement effective remedy for Cat 1-2 grievances
- Promote the procedure throughout and without the BU, its clients and with the community within which it operates

2.6. All Staff

It is the responsibility of all staff to act appropriately at all times in accordance with G4S policy and values and applicable laws.

All staff are to be made aware of this Policy and trained on the effective operation of the Grievance mechanism.

3. Risk Based Approach

G4S Risk Management has conducted a risk assessment to inform this Policy and associated procedures. See [Annex A – Risk Assessment](#).

4. Policy

G4S Risk Management provides high quality services in such a way as to enhance the safety and security of its staff, our clients and the communities within which we operate.

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However, it is also realistic to assume that, from time-to-time, mistakes may happen or that our staff or subcontractors might not act appropriately in contravention of G4S Policies and Values.

Such examples of corporate misconduct might include:

- Inappropriate use of force
- Actions or omission that cause
 - damage or injury (personal loss)
 - offense or harm to faith, culture or heritage
 - damage or harm to the natural environment
- Actions or omissions that may otherwise impact on Human Rights and Fundamental Freedoms, in particular;
 - the right to life, liberty and security
 - torture or cruel, inhuman or degrading treatment or punishment
 - arbitrary detention
 - interference with privacy, family, home or correspondence
 - the right to freedom of movement and residence

It is therefore desirable that G4S Risk Management ensure that, should a failure occur, the following procedures are in place:

- A mechanism for External Third Parties to access in order to raise a Grievance
- A mechanism to record, report and respond to the Grievance
- An investigation process
- A communications process
- An adjudication and resolution process

Of vital importance is the need for trained and competent management to act appropriately.

4.1. Process Map

The Process Map is at [Annex B – Process Map](#).

Procedures must be fair, accessible and offer effective remedies, including recommendations for the prevention of recurrence.

When interacting with an External Third Party, always remain calm and do not aggravate the situation.

- Do not admit liability
- Take as much information as possible including from witnesses where possible.

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An Incident Report shall be issued and all information and documentation should be retained in the appropriate folder within Google Drive, applying appropriate security and data protection protocols.

4.2. Third Party Grievance Process

4.2.1. Localised Process

Wherever practical, G4S Risk Management will engage and consult with external stakeholders for the development of its localised grievance mechanism. However, this may not always be possible due to both risks to G4S staff and clients and local stakeholders themselves.

4.2.2. Client Process

G4S Risk Management will engage with its Clients to ensure an integrated approach to third party stakeholder management.

4.2.3. Process Principles

The UN Guiding Principle on Security and Human Rights has established the following effectiveness criteria that G4S Risk Management shall adopt as the principles by which it shall operate its grievance mechanism:

- Legitimate – enabling trust from the stakeholder groups for whose use they are intended and for being accountable for the fair conduct of grievance processes
- Accessible – being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face particular barriers to access
- Predictable – providing a clear and known procedure within an indicative timeframe for each stage and clarity on the types of process and outcome available and means of monitoring implementation
- Equitable – seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
- Transparent – keeping parties to a grievance informed about its progress and providing sufficient information about the mechanism’s performance to build confidence in its effectiveness and meet any public interest at stake whilst balancing the requirement of confidentiality and not prejudicing the process
- Rights Compatible – ensuring that outcomes and remedies accord with internationally recognised human rights

4.2.4. Allegations of Significant Severity

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Where an alleged Grievance involves allegations of criminal acts, violations of human rights or imminent danger, G4S shall respond immediately and alert the authorities as appropriate.

4.2.5. Process Communication

G4S Risk Management shall promote this grievance process and improve awareness of its existence and how it may be accessed. This will be done through:

- Liaison with local community
- Engagement with local authorities
- Promotion within the workforce and subcontractors
- Promotion with the client
- Including a description and link on the <https://www.g4sriskmanagement.com> website

Throughout the grievance process communication should be maintained with the complainant so that they are engaged with and are an integrated part of the process.

4.2.6. Receiving a grievance

There are a number of touch points that an external third party may use to raise a grievance. They are as follows:

Email/Telephone – Can be a call or email to positional or named email account.

Incident – An incident may occur involving a third party. The Incident Report must capture information about the third party involvement as well as damage or injuries to the third party.

Physical Representation – this includes meetings such as with local communities or clients as well as staff being approached such as at a static guard post.

Social Media – Comments made on platforms such as Facebook/LinkedIn/Twitter.

Whilst there are a number of touch points whereby an External Third Party may raise a grievance, it is important that the grievance is received, identified as such, recorded, communicated and actioned internally within G4S Risk Management.

In order to do so, management must recognise the grievance and take the appropriate action. Staff should acknowledge receipt of the grievance without admitting any liability and attempt to record as much information as possible.

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The grievance information should be detailed in an Incident Report and, depending upon the severity of the potential impact, assigned a category, category 5 being the highest and category 1 the lowest scale.

- Category 5 - Critical impact
- Category 4 - Significant impact
- Category 3 - Medium / limited impact
- Category 2 - Low impact
- Category 1 - Minimal impact

In order to assess the potential impact, guidance should be sought from the G4S Risk Management Managing Director.

4.2.7. Strategic Communication - Reporting

Once the BU issues an Incident Report detailing the alleged grievance, it shall be considered as communicated to strategic management. The G4S Risk Management Senior Management Team (SMT) shall review and agree the category and amend as necessary.

4.2.8. Grievance Management – Assigning a category

The potential severity of the grievance and the resources of the BU will determine the level of strategic response to manage the grievance. As a general rule, all grievances categorised as 1-2 shall be managed by the BU and categories 3-5 by the SMT. However, where the grievance relates to allegations against the BU, the SMT shall manage the grievance.

4.2.9. Grievance Investigation

Once the grievance has been reported, assigned the appropriate category and the appropriate level of management response established, the grievance will be expeditiously and impartially investigated. Where appropriate the investigation shall cooperate with official external investigation mechanisms. The internal investigation shall be carried out in accordance with Conducting Internal Investigations Procedure (internal use only, can be made available to external users upon approved request).

On completion of the investigation, the Lead Investigator shall submit a detailed investigation report to the Investigation Authority. The report will include recommendations for remedy.

4.2.10. Protection of complainant and witnesses

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G4S Risk Management shall act to prevent intimidation of witnesses or inhibit the gathering of evidence. Further, G4S Risk Management shall ensure the protection of individuals submitting a complaint or grievance in good faith from retaliation.

4.2.11. Findings/Remedy and Corrective Action

The findings of the investigation shall be reviewed internally along with recommendations for remedy at the appropriate level. These shall always include Corrective Actions to ensure that the incident does not reoccur and that the likelihood of an occurrence within another part of the operation is significantly reduced.

This shall be a consultation process, where the outcome of the investigation and the effective remedy is presented to the complainant for feedback.

The following should be considered as an effective remedy:

- Amendments to TTP, SOPs, Actions ON, Safe Systems of Work etc.
- Training and Awareness – Driver Training, Cultural Awareness Training etc.
- Increased community engagement when planning and executing operations
- Ensuring industry codes of practice are met (ICOC, PSC1, 18788)
- Verbal and/or written apology for harm or offence caused
- Compensation for damage or loss caused

4.2.12. Dialogue, Mediation and Voluntary Adjudication

Should the complainant not accept the remedy as presented, dialogue should be maintained and mediation may be offered to the third party. Internal arbitration/mediation may be entered into by staff unrelated to the operation. This shall be the responsibility of the G4S Risk Management Compliance Oversight Committee. If the grievance remains unresolved, then G4S Risk Management will consider independent external adjudication if appropriate.

4.3. Monitoring and Reporting

The effective implementation of the grievance process shall be monitored by the Compliance Oversight Committee as part of the Annual Business Operations Plan. Findings of the Committee will be published at the quarterly G4S Risk Management Executive Committee meetings.

The Committee shall report to the G4S Ethics Committee as required.

5. List of Annexes

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- [Annex A – Risk Assessment](#)
- [Annex B – Process Map](#)

6. Annex A - Risk Assessment

Serial	Risk	Likelihood	Impact	Inherent Risk	Controls	Likelihood	Impact	Residual Risk
1	Conflict with local stakeholders leading to lack of freedom of movement, loss of "social license"	4	4	8	Adherence to G4S values and Policy commitments. Engagement and consultation with stakeholders	2	2	4
2	No effective grievance mechanisms leading to resentment with local stakeholders	3	4	7	G4S RM grievance mechanisms aligned to Principles contained in the UNGPS&HR	1	2	3
3	Lack of effective remedy	3	4	7	Management oversight and arbitration process	1	2	3

Summary:

Any unresolved conflict with no transparent means of resolution has the potential to harm operations. Maintaining the "social licence" to operate within the communities affected by our operations is the key. Prevention of conflict through the ethical implementation of security services respecting human rights combined with a consultation and engagement process shall ensure that G4S Risk Management maintains freedom of movement to operate and reduces the possibility for physical, reputational and financial harm.

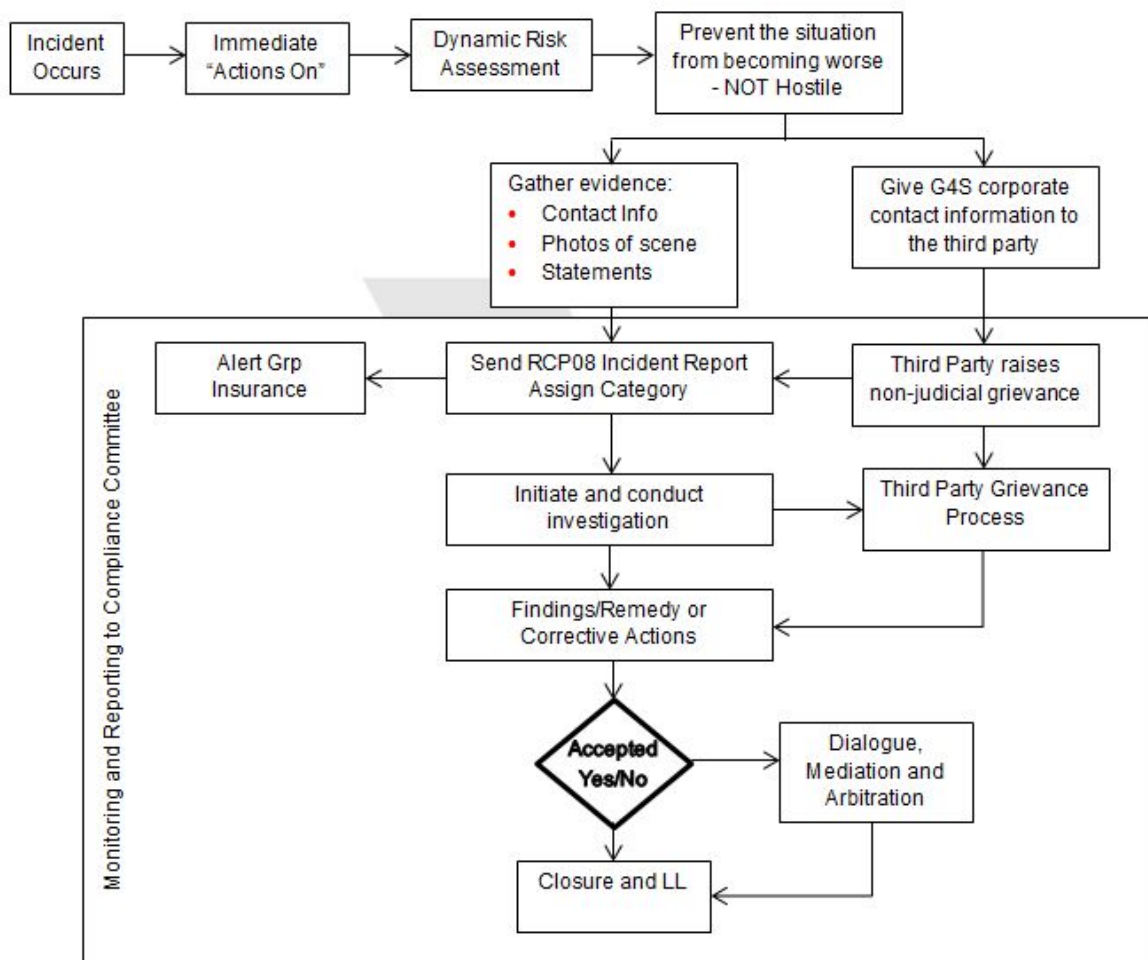
Business Units may consider the benefits of a localised risk assessment to address specific risks within their areas of operations.

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7. Annex B – Process Map

The below process map shows the key stages of the grievance process. The example used is of an incident occurring during a mobile operation as experience has shown that the most common occurrence involving a third party is an RTI. In a hostile situation staff should initially refer to SOP “Actions On” as the security and safety of the client and G4S staff are paramount. However, where possible, the following should apply:



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